

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Gregg Stephen Juris  
**Debtor 1**  
Maryanne Monica Juris  
f/k/a Maryanne Monica Kane  
**Debtor 2**

**Chapter 13**  
**Case No.** 1:18-BK-01323-HWV  
**Matter:** Motion to Incur Debt/Obtain Credit

**DEBTOR(S)' MOTION TO INCUR DEBT**

AND NOW, come the Debtor(s), Gregg Stephen Juris and Maryanne Monica Juris, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion to Incur Debt/Obtain Credit and aver as follows:

1. This case was commenced by the filing on March 30, 2018 of a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtor(s) are seeking to purchase a personal residence.
3. Debtor(s) have obtained approval for financing from LMC located in Lancaster, Pennsylvania.
4. It is estimated that the monthly payments on the mortgage will be approximately \$1,800.00 per month, including escrow for real estate taxes and homeowner's insurance, for 360 months. The interest rate on the mortgage note will be 4.00% or less.
5. Debtor(s) are confident that the increased payments will not affect Debtor(s)' ability to continue his Chapter 13 payments.
6. Debtor(s) intend to make all payments on the mortgage note outside the Chapter 13 plan in this case.
7. For all the reasons set out above, Debtor(s) believes that the granting of this Motion will not materially or adversely affect the interests of any creditor, nor Debtor(s)' prospects for successful completion of the Chapter 13 Plan in this case and will instead permit Debtor(s) to purchase a personal residence which is necessary for the Debtor(s) to live in, and hence necessary for the successful completion of the Chapter 13 Plan in this case.

WHEREFORE, Debtor(s) moves this Honorable Court for leave to incur the new debt described above and prays for such other and further relief as the Court deems just and proper.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: January 7, 2021

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
PA ID No. 201207  
2132 Market Street  
Camp Hill, PA 17011  
(717) 975-9446  
pmurphy@dplglaw.com  
*Attorney for Debtor(s)*



1794 Oregon Pike  
Lancaster PA 17601  
717-560-2114  
NMLS #836585

**Re: Mortgage Prequalification Letter**

Date: December 10, 2020

Dear Gregg,

It is with great pleasure that LMC extends to you the pre-qualification of your home loan. We look forward to working with you throughout your loan process. **LOAN TYPE: FHA**

**Name:**

Gregg Juris  
Rosalie Juris

**Secured by the property located at:**

TO BE DETERMINED

**Loan Terms:**

Sales Price: 422,770  
Loan Amount: 331,760  
Loan Term: 360  
Interest Rate: 3.250

**Specific conditions required prior to closing include the following:**

1. Acceptable appraisal supporting the purchase price.
2. Title to be free and clear of all judgments and liens at the time of closing.
3. Rate subject to change until locked.
4. Subject to maintaining a minimum credit score of 640 and as COVID guidelines dictate.
5. Contingent upon sale/settlement of current home/FHA mortgage satisfied.
6. Evidence of Hazard Insurance and Flood Insurance (if required).
7. Loan subject to approval from underwriter once all documentation is received.

We understand that financing your home is one of the most important decisions you make in your lifetime. LMC would like to make your experience as delightful as the time you will spend in your new home. Please feel free to call us if you have any questions on the terms and conditions of this approval.

Sincerely,

Debra Martin  
NMLS # 649823

PreQual - Lancaster



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**NOTICE**

Notice is hereby given that:

The Debtor(s) filed a Chapter 13 Bankruptcy Petition on **March 30, 2018**.

A hearing on the above-referenced matter has been scheduled for:

<b>United States Bankruptcy Court Ronald Reagan Federal Building Bankruptcy Courtroom (3<sup>rd</sup> Floor) Third &amp; Walnut Streets Harrisburg, PA 17101</b>	<b>Date: January 26, 2021</b>  <b>Time: 9:30 AM</b>
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Any objection/response to the above-referenced matter must be filed and served on or before **January 21, 2021**.

If service was properly made and Respondent(s) fail to file any objection/response by the above-specified date, the Court **may** determine after review of the Motion that no hearing is required and grant the relief requested.

If a default order has not been signed and entered, the parties or their counsel are required to appear in Court at the hearing on the above date and time.

Date: January 7, 2021

Paul D. Murphy-Ahles, Esquire  
PA ID No. 201207  
DETHLEFS PYKOSH & MURPHY  
2132 Market Street  
Camp Hill, PA 17011  
(717) 975-9446  
pmurphy@dplglaw.com  
*Attorney for Debtor(s)*

**UNITED STATES BANKRUPTCY COURT  
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Maryanne Monica Juris  
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**Debtor 2**

**Chapter 13**  
**Case No.** 1:1-BK-01323-HWV  
**Matter:** Motion to Incur Debt/Obtain Credit

**ORDER OF COURT**

UPON CONSIDERATION of the Debtor(s) Motion to Incur Debt/Obtain Credit, said Motion IS HEREBY GRANTED, and the Debtor(s) is permitted to obtain financing from LMC for the purpose of purchasing a personal residence for Debtor(s), up to the purchase price of \$430,000, at an interest rate of 4.00% or less.

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**CERTIFICATE OF SERVICE**

I hereby certify that on Thursday, January 7, 2021, I served a true and correct copy of the **Debtor(s)' Motion to Incur Debt/Obtain Credit, Notice of Opportunity to Object and Hearing, and proposed Order** in this proceeding via electronic means or USPS First Class Mail upon the recipients as listed in the Mailing Matrix.

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire

Label Matrix for local noticing  
0314-1  
Case 1:18-bk-01323-HWV  
Middle District of Pennsylvania  
Harrisburg  
Wed Dec 30 16:26:18 EST 2020

AT&T Mobility II LLC  
%AT&T SERVICES INC.  
KAREN A. CAVAGNARO PARALEGAL  
ONE AT&T WAY, SUITE 3A104  
BEDMINSTER, NJ. 07921-2693

AmeriCredit Financial Services  
801 Cherry Street, Suite 3500  
Fort Worth, TX 76102-6854

American Home Warranty  
Attn: Bankruptcy Department  
PO Box 7248  
Santa Rosa, CA 95407-0248

Apothaker Scian, PC  
520 Fellowship Road, Suite C306  
PO Box 5496  
Mount Laurel, NJ 08054-5496

Barclays Bank Delaware  
PO Box 8803  
Wilmington, DE 19899-8803

Capital One Auto Finance, a division of Capi  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Cavalry SPV I, LLC  
500 Summit Lake Drive, Ste 400  
Valhalla, NY 10595-2321

Collins Asset Group, LLC  
Bass & Associates, P.C.  
3936 E. Ft. Lowell Road, Suite #200  
Tucson, AZ 85712-1083

(p)CREDIT CORP SOLUTIONS INC  
121 W ELECTION RD  
SANDY UT 84020-7766

ACAR Leasing LTD d/b/a GM Financial Leasing  
PO Box 183853  
Arlington, TX 76096-3853

Ally Financial  
PO Box 137424  
Roseville MN 55115-0004

American Express  
PO Box 297871  
Fort Lauderdale, FL 33329-7871

(p)AMERICREDIT FINANCIAL SERVICES DBA GM FINAN  
PO BOX 183853  
ARLINGTON TX 76096-3853

Asset Recovery Solutions, LLC  
2200 East Devon Avenue, Suite 200  
Des Plaines, IL 60018-4501

CACH, LLC its successors and assigns as assi  
of Avant  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Capital One Bank USA, NA  
PO Box 30285  
Salt Lake City, UT 84130-0285

(p)JPMORGAN CHASE BANK N A  
BANKRUPTCY MAIL INTAKE TEAM  
700 KANSAS LANE FLOOR 01  
MONROE LA 71203-4774

Collins Asset Group, LLC  
PO Box 71053  
Austin, TX 78709-1059

Credit One Bank, NA  
PO Box 98875  
Las Vegas, NV 89193-8875

AT&T Mobility  
PO Box 163114  
Atlanta, GA 30353-7104

Ally Financial, Inc.  
Ally Detroit Center  
500 Woodward Avenue  
Detroit, MI 48226-3416

American Express National Bank  
c/o Becket and Lee LLP  
PO Box 3001  
Malvern PA 19355-0701

Americredit Financial Services, Inc.Dba GM F  
P.O. Box 183853  
Arlington, TX 76096-3853

Avant  
222 North LaSalle Street #1700  
Chicago, IL 60601-1101

Capital One Auto Finance, a division of Capi  
AIS Portfolio Services, LP  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

(p)CAVALRY PORTFOLIO SERVICES LLC  
500 SUMMIT LAKE DR  
STE 400  
VALHALLA NY 10595-2322

Collection Center Industries  
PO Box 8666  
Lancaster, PA 17604-8666

Comenity Bank / PayPal Credit  
Attn: Bankruptcy Department  
PO Box 182125  
Columbus, OH 43218-2125

DIRECTV  
PO Box 5007  
Carol Stream, IL 60197-5007



Charles J DeHart, III (Trustee)  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036-8625

Discover Bank  
Discover Products Inc  
PO Box 3025  
New Albany, OH 43054-3025

Discover Financial Services, LLC  
PO Box 3025  
New Albany, OH 43054-3025

Financial Recovery Services, Inc.  
PO Box 385908  
Minneapolis, MN 55438-5908

Jeffrey T. Bitzer, Esquire  
1 West Market Street  
York, PA 17406-7201

Gregg Stephen Juris  
806 Arbor Lane  
York, PA 17406-7201

Maryanne Monica Juris  
806 Arbor Lane  
York, PA 17406-7201

LVNV Funding, LLC its successors and assigns  
assignee of MHC Receivables, LLC and  
FNBM, LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Loan Depot  
PO Box 77404  
Ewing, NJ 08628-6404

MRS BPO, LLC  
1930 Olney Avenue  
Cherry Hill, NJ 08003-2016

Mariner Finance  
8211 Town Center Drive  
Nottingham, MD 21236-5904

Memorial Hospital  
PO Box 505167  
Saint Louis, MO 63150-5167

Midland Funding, LLC  
2365 Northside Drive, Suite 80  
San Diego, CA 92168-2709

Midland Funding, LLC  
Midland Credit Management, Inc.  
as agent for Midland Funding, LLC  
PO Box 2011  
Warren, MI 48090-2011

Miller Dipietro Associates  
PO Box 143  
Landisville, PA 17538-0143

Paul Donald Murphy-Ahles  
Dethlefs Rykosh & Murphy  
2131 Market Street  
Camp Hill, PA 17011-4706

Northstar Location Services  
4285 Genesee St  
Cheektowaga, NY 14225-1943

PA Emergency Physicians, PLLC  
PO Box 975213  
Dallas, TX 75397-5213

PRA Receivables Management, LLC  
PO Box 11021  
Norfolk, VA 23541-1021

Pennsylvania Department of Revenue  
Bankruptcy Division  
P.O. Box 280946  
Harrisburg, PA 17128-0946

PennyMac Loan Services, LLC  
P.O. Box 2010  
Moorpark, CA 93020

Pennymac Loan Services  
Attn: Bankruptcy Department  
PO Box 514387  
Los Angeles, CA 90051-4387

Pinneacle Health Memorial Hospital  
PO Box 829774  
Philadelphia, PA 19182-9774

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

Quantum3 Group LLC as agent for  
Velocity Investments LLC  
PO Box 788  
Kirkland, WA 98083-0788

TD Bank USA / Target Card  
PO Box 673  
Minneapolis, MN 55440-0673

TD Bank USA, N.A.  
C O WEINSTEIN & RILEY, PS  
2001 WESTERN AVENUE, STE 400  
SEATTLE, WA 98121-3132

Terminex  
Attn: Bankruptcy Department  
860 Ridge Lake Boulevard  
Memphis, TN 38120-9408

United States Trustee  
228 Walnut Street, Suite 1190  
Harrisburg, PA 17101-1722

Verizon  
500 Technology Drive, Suite 30  
Weldon Spring, MO 63304-2225

James Warmbrodt  
701 Market Street, Suite 5000  
Philadelphia, PA 19106-1541

Wells Fargo Bank, N.A.  
Wells Fargo Card Services  
PO Box 10438, MAC F8235-02F  
Des Moines, IA 50306-0438

Wells Fargo Card Services  
PO Box 14517  
Des Moines, IA 50306-5517

Wellspan Health  
1001 S George St  
York, PA 17403-3676

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Americredit Financial Services, Inc.  
Dba GM Financial  
P.O Box 183853  
Arlington, TX 76096

(d)Americredit Financial Services, Inc.  
P.O Box 183853  
Arlington, TX 76096

Cavalry Portfolio Services  
PO Box 27288  
Tempe, AZ 85285

Chase Card  
PO Box 15298  
Wilmington, DE 19850

Credit Corp Solutions, Inc.  
63 East 11400 South 408  
Sandy, UT 84070

Portfolio Recovery Associates, LLC  
PO Box 41067  
Norfolk, VA 23541-1067

(d)Portfolio Recovery Associates, LLC  
POB 12914  
Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)PENNYMAC LOAN SERVICES, LLC

(d)PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

End of Label Matrix	
Mailable recipients	63
Bypassed recipients	2
Total	65

